

George E. Borchers
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Princeton Jct., NJ 08550
609-799-1246

December 15, 1998

Office Of General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

MUR 4874

To Whom It May Concern:

BACKGROUND

In this year's election for the New Jersey 12th Congressional District seat, which District spans 5 counties within the State, including Hunterdon, Mercer, Middlesex, Monmouth and Somerset, and the communities identified in the attached Exhibit One, Mrs. Beverly Kidder was the Reform Party candidate. On numerous occasions during the Campaign the Trenton Times (Times) provided editorials supporting the Democratic candidate Rush Holt, full well knowing Mr. Holt to be an 'insider', that Mr. Holt's employer PPL in its 15 years of existence produced 'nothing', that Mr. Holt and other executives when faced with foregoing 'world-wide junkets' at taxpayers expense or lay off lower level staff, Mr. Holt and the others opted to fire the lower level staff, and in information and belief, knew Mr. Holt received one or more illegal campaign contributions.

It is a material fact that over 56% of the registered voters in the 12th District are Independent, and less than 43% of the voters are registered as Democrats or Republicans. By not informing the Independent voters in the 12th Congressional District of the above facts, and the Times' disproportionate OP-ED pieces, Letters to the Editor and coverage by reporters Jim Goodman, Charles Stiles and Tracey Reagan, in information and belief, the Times knowingly, willfully, and maliciously failed to proportionately provide print coverage, by and for the benefit of the Independent registered voters, and the minority party candidates in the 12th District.

Further, when the Chairperson and Co-Chairperson of the nationally recognized Reform Party, whose candidate in Minnesota was elected Governor, traveled to Trenton to introduce the Reform Party's 12th Congressional District candidate at a Press Conference, no one from the Times attended the Conference, clearly demonstrated the Times' blatant disregard for the needs and concerns of the registered Independent voters in the 12th District.

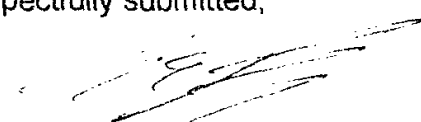
Complaint

1. That the Times, full well aware that over 56% of the registered voters in the 12th Congressional District are Independent, did knowingly, willfully and maliciously fail to provide proportional print coverage in its newspaper, by and for the benefit of the Independent registered voters in the 12th District; all in violation, in information and belief, of tax deductions afforded advertisers of the Times, and those policies of fairness and neutrality regarding the press, as all is set forth by the FEC.
2. That, in information and belief, certain advertisers in the Times also provide significant contributions to the Republican and Democratic parties, and which contributions have a chilling and significant effect upon the efficacy and the fairness of the Times, by and for the benefit of the Independent registered voters in the 12th District; all in violation of those policies of fairness and neutrality regarding the press, as all is set forth by the FEC.
3. That, in information and belief, the Mrs. Kidder For Congress Campaign was advised by a reporter from the Times that Mr. Holt's Campaign had received a \$9,000 illegal campaign contribution from an individual, and the Times failed to make that knowledge public.

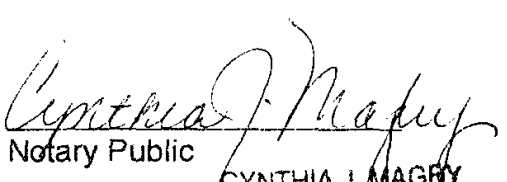
Relief

1. That the Federal Election Commission sanction and otherwise reprimand the Times for its knowing, willful and malicious failure to provide proportional representation in its print coverage, by and for the benefit of the registered Independent voters in the 12th District.
2. That the Federal Election Commission investigates if any illegal contributions were made to Mr. Holt's Campaign, and more specifically, whether an individual contributed \$9,000.
3. That, by copy of this Complaint, the Internal Revenue Service District Director for New Jersey review for disallowance, all deductions declared by advertisers of the Times in proportion to that number of 12th Congressional District subscribers.
4. That, by copy of this Complaint, the United States Attorney for New Jersey review all allegations set forth herein in order to determine if any laws of the United States were violated.

Respectfully submitted,


George E. Borchers
December 15, 1998

Sworn and sworn to before me: *December 16, 1998*


Notary Public

CYNTHIA J. MAGBY
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Apr. 7, 2002

MRS. KIDDER FOR CONGRESS

P.O. Box 113 - CRANBURY, NJ 08512

609-466-7344

12TH CONGRESSIONAL DISTRICT

HUNTERDON: ALL

**MERCER: CLARKSVILLE, DUTCH NECK, EWING, GROVERS MILL,
HARBOURTON, HOPEWELL BORO, HOPEWELL TOWNSHIP,
LAWRENCE TOWNSHIP, LAWRENCEVILLE, PENNINGTON,
PENNS NECK, PRINCETON BORO, PRINCETON JUNCTION,
PRINCETON TOWNSHIP, SCUDDERS FALLS, SLACKWOOD,
TITUSVILLE, WASHINGTON CROSSING, WEST TRENTON
AND WEST WINDSOR**

**MIDDLESEX: CRANBURY, EAST BRUNSWICK, HELMETTA, JAMESBURG,
MONROE, PLAINSBORO AND SOUTH BRUNSWICK**

**MONMOUTH: COLTS NECK, EATONTOWN, ENGLISHTOWN, FAIR HAVEN,
FREEHOLD BORO, FREEHOLD TOWNSHIP, HOLMDEL,
INTERLAKEN, LITTLE SILVER, MANALAPAN, MARLBORO,
OCEAN TOWNSHIP, OCEANPORT, RUMSON, SHREWSBURY
BORO, SHREWSBURY TOWNSHIP, TINTON FALLS AND
WEST LONG BRANCH**

**SOMERSET: BEDMINSTER, BELLE MEAD, BERNARDSVILLE,
BRANCHBURG, FAR HILLS, MONTGOMERY, PEAPACK -
GLADSTONE, ROCKY HILL AND SKILLMAN**

Non's List Of Major Partners

EXHIBIT TWO

- AT&T
- GPU Energy
- NJ State Bar Foundation
- PSE&G

- Bell Atlantic
- Columbus Hospital Foundation
- HIP Health Plan of NJ
- NJ Council for the Humanities
- NJ Education Association
- Sprint

- AAA Clubs of New Jersey
- Beneficial Management Corporation
- The Chase Manhattan Bank
- Deborah Heart & Lung Center
- Glenmede Trust Co. of NJ
- Konica U.S.A., Inc.
- Leisure Time Spring Water
- Valley National Bank

- ADP
- Amelior Foundation
- C.R. Bard Foundation
- Benjamin Moore & Co.
- Cigna
- The Walter Henry Freygang Foundation
- Goya Foods, Inc
- Horizon Blue Cross Blue Shield of NJ
- Investment Expo
- Jersey Cares
- The Curtis W. McGraw Foundation
- Merck & Co. Inc.
- NJ Dept. of Agriculture
- NJ Div. of Fish, Game & Wildlife
- NJ Institute of Technology
- NJ Redevelopment Authority
- NJ Utilities Association
- PETsMART Charities
- The Princeton Public Affairs Group
- Summit Bancorp
- Woodworker's Warehouse

- Geraldine R. Dodge Foundation
- NJ Division of Travel & Tourism
- NJ State Council on the Arts
- The Prudential Foundation

- Allen and Joan Bildner Family Foundation
- First Union
- Johnson & Johnson
- NJ Department of Education
- PNC Bank

- Becton Dickinson and Co.
- Bristol-Myers Squibb Co.
- The CIT Group, Inc.
- Fox Chase Cancer Network
- Hoffmann-LaRoche Inc.
- Kuiken Brothers
- NJ Performing Arts Center
- Wakefern Food Corporation

- AlliedSignal Foundation
- American Home Products Corporation
- The Edna and Jack Balasco Foundation
- Bernice Barbour Foundation
- Ambrose & Ida Fredrickson Foundation
- General Motors
- Hill Wallack Attorneys at Law
- Hovnanian Enterprises, Inc.
- IRES, Inc.
- MCJ Foundation
- McMaster-Carr Supply Co.
- NJ Coalition of Automotive Retailers
- NJ Dept. of Community Affairs
- NJ Historical Commission
- NJ Lawyers Diary & Manual
- NJ Relay Service
- Palmer Square
- PNC Bank Arts Center
- Schering-Plough Corporation
- United Way of Morris County
- WPVI - TV